

Exhibit B

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

SONYA LARSON

Plaintiff,
v.

DAWN DORLAND PERRY, et al.

Defendants.

Civil Action No.

1:19-cv-10203-IT

**AFFIDAVIT OF ANDREW D. EPSTEIN IN SUPPORT OF PLAINTIFF, DEFENDANT
IN COUNTERCLAIM, SONYA LARSON'S EMERGENCY MOTION TO COMPEL**

I, Andrew D. Epstein, on oath depose and state as follows:

1. I searched the Internet under Dorland's name to see if I could find examples of things that Ms. Dorland has written and published. Except for a reference to a novel that Ms. Dorland claims that she has been working on for quite some time, I could not find anything.

3. I searched through some Facebook comments that Ms. Dorland has previously produced. I counted the names of over 70 individuals who were part of Ms. Dorland's Facebook group. These individuals were people who commented on Ms. Dorland's surgery.

Signed under the pains and penalties of perjury this 5th day of April 2021.

Andrew D. Epstein